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Propco LLC et al.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA (RENO)

ERIN ROBERTSON,

Plaintiff,

vs.

INSURANCE PIPELINE, INC.

Defendants.

Case No.: 3:25-cv-00294-MMD-CLB

**ORDER GRANTING JOINT  
STIPULATION FOR  
DEFENDANT'S EXTENSION  
OF TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

Defendant Insurance Pipeline, Inc. and Plaintiff Erin Robertson, through undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b) and District of Nevada Local Rule I.A. 6-1, submit this Joint Stipulation that Defendant shall have a 30-day extension of time to respond to Plaintiff's Complaint (D.E. 1), and state as follows:

1. On June 11, 2025, Plaintiff Erin Robertson filed her Complaint. D.E. 1.
2. On June 26, 2025, Defendant Insurance Pipeline, Inc. was served with the Summons and Complaint. D.E. 7.
3. Defendant's response to the Complaint is currently due on Thursday, July 17, 2025.
4. With the deadline approaching, Defendant reached out to Plaintiff's counsel to seek a 30-day extension of time to file a response to the Complaint. And Plaintiff's counsel agrees to the requested 30-day extension for Defendant to respond to the Complaint.
5. Defendant's counsel requires additional time to meet with its client and review the

relevant documentation and factual allegations in the Complaint, analyze the claims to formulate defenses to be included in the responsive pleadings, and conduct substantive legal research on the case law and statutes cited in the Complaint, including the Telephone Consumer Protection Act established in 47 U.S.C. § 227 (“TCPA”) and 47 C.F.R. § 64.1200.

6. Defendant and Plaintiff now file this Joint Stipulation, pursuant to District of Nevada Local Rule I.A. 6-1, for Defendant’s response to the Complaint to be due on Thursday, August 17, 2025.

7. This is the first stipulation for an extension of time to respond to the Complaint.

8. Pursuant to District of Nevada Local Rule I.A. 6-2, a proposed order appears on the last page of this stipulation.

Dated: July 15, 2025

Respectfully submitted,

By: /s/ Phillip Silvestri

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*Attorneys for Plaintiff and Proposed Class*

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: July 15, 2025

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